

UNITED STATES DISTRICT COURT

for the
Western District of WashingtonIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
32115 20th Lane SW, Apt. 55, Federal Way,
Washington

Case No. MJ24-037

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, incorporated by this reference

located in the _____ Western _____ District of _____ Washington _____, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. 841, 846	Drug Trafficking, Conspiracy to Commit Drug Trafficking
18 U.S.C. 1956	Money Laundering, including Conspiracy to Commit Money Laundering

The application is based on these facts:

- ☒ See Affidavit of _____, continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

SIEDAH LESESNE

Digitally signed by SIEDAH LESESNE
Date: 2024.01.24 08:18:57 -08'00'

Applicant's signature

Siedah Lesesne, Special Agent, DEA

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 01/24/2024

Judge's signature

City and state: Seattle, Washington

The Hon. S. Kate Vaughan, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A SEARCH WARRANT

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

I, SIEDAH LESESNE, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I make this affidavit in support of an application to obtain a search warrant for a physical location more particularly described in A hereto (hereafter the “Subject Premises”). There is probable cause to believe that Maurice LYNCH (hereafter “M. LYNCH”), more particularly described in Attachment B, is located at this location. LYNCH has a federal arrest warrant out of the Northern District of Georgia, and a federal search warrant has also been issued for his person. This application seeks permission to search the SUBJECT PREMISES for LYNCH’s person and for any cellular telephones associated with him located at the SUBJECT PREMISES.

AGENT BACKGROUND

2. I am a Special Agent (SA) with the Drug Enforcement Administration (DEA) within the United States Department of Justice and have been employed with the DEA since August 2021. As a Special Agent, I investigate violations of the Controlled Substance Act, Title 21, United States Code, Section 801, et seq., and other violations of federal law. I attended the Drug Enforcement Administration's Office of Training in Quantico, Virginia, where I was trained to conduct investigations relating to violations of federal law including the manufacturing and trafficking of controlled substances and money laundering.

3. Prior to my employment with the DEA, I was a Deputy Sheriff with the Orange County Sheriff's Office (OCSO) in Orlando, Florida for approximately nine years. At the OCSO, I conducted long-term investigations involving fraud, organized

1 crimes, and narcotics investigations. During my tenure with OCSO, I attended
2 Investigative Drug Trainings, Advanced Narcotics Investigations Trainings, Surveillance
3 Techniques Trainings, Undercover Operations Training, and Basic Concepts of Cellular
4 Technology. I am also a graduate of the Valencia College Criminal Justice Institute
5 where I became a certified Police Officer in the state of Florida for my position with
6 OCSO.

7 4. As a federal law enforcement officer and through my employment as a law
8 enforcement officer at the state level, I have received formal training, as well as extensive
9 on-the-job training, in the investigations of narcotics trafficking. I have conducted and
10 participated in several investigations involving-controlled substances, money laundering,
11 and other criminal activity, including those leading to arrest and prosecution. As a result
12 of these investigations, I have become familiar with methods and techniques used by
13 narcotics manufacturers and distributors, persons in possession of narcotics for purposes
14 of sales and transportation, and persons conspiring to transport and sell narcotics. I am
15 also familiar with the methods employed by narcotics traffickers to conceal their
16 trafficking activity and the origin of proceeds generated by this activity. I am aware that
17 traffickers use slang and coded words, multiple cell phones, “traps” concealed
18 compartments, “stash” houses to conceal their activities, and launder or otherwise
19 conceal cash proceeds by hiding and transporting bulk cash, sending funds through wire
20 transfers or bank accounts in other persons’ names, or investing in assets placed in other
21 persons’ names.

22 5. The facts set forth in this Affidavit are based on my own personal
23 knowledge; information obtained from other law enforcement officers involved in this
24 investigation; review of documents and records related to this investigation;
25 communications with others who have personal knowledge of the events and
26 circumstances described herein; and information gained through my training and
27

1 experience. The facts below do not include everything known to me about this
2 investigation.

4 SUMMARY OF PROBABLE CAUSE

5 Background Investigation

6 6. The United States, including the DEA, is conducting a criminal
7 investigation into the Mario EARL Drug Trafficking Organization (DTO) and its
8 members both known and unknown regarding the possible violations of 21 U.S.C. §§
9 841(a)(1) and 846. Since December 2021, the DEA Atlanta Filed Division (AFD) has
10 been investigating a cocaine drug trafficking organization (the "DTO") operating
11 throughout the United States. One of the identified members of the DTO is M. LYNCH
12 (hereafter "M.

13 7. On October 24, 2023, a Federal Grand Jury in the Northern District of
14 Georgia returned an indictment charging several individuals, including M. LYNCH,
15 WASHINGTON with conspiracy to distribute a controlled substance (cocaine) in
16 violation of Title 21, United States Code, Sections 846 and 841 (Count One), and
17 conspiracy to launder money (Count Seven), among other charges, in Case No. 1:23-CR-
18 335 (under seal). Following the indictment, the Court issued arrest warrants for each of
19 these individuals, including M. LYNCH.

20 8. On January 19, 2024, U.S. Magistrate Judge Brian A. Tsuchida issued a
21 search warrant for multiple locations associated with the DTO in this District, including
22 the person of M. LYNCH and his suspected residence, under Case No. MJ24-025 (also
under seal).

23 9. A judge in the Northern District of Georgia had previously issued a warrant
24 to permit investigators to obtain the location data for M. LYNCH's phone in aid of
25 executing the arrest and search warrant.

26 10. On morning of January 24, 2024 (today), investigators went to execute the
27 arrest and search warrants. M. LYNCH's locatin data put him in the vicinity of the

1 SUBJECT PREMISES with an approximate margin of error of 1,000 meters, according
2 to another investigator coordinating the execution of the warrants.

3 11. The other investigator looked at M. LYNCH's phone toll information and
4 identified a phone number subscribed to a woman named Dominique Hill as one M.
5 LYNCH's top callers. The subscriber address for that phone number is the SUBJECT
6 PREMISES.

7 12. I located a public Facebook page for a person I believe to be Dominique
8 Hill. In a publicly available photograph on that Facebook page there was a caption
9 "#LynchBabies."

10 13. Investigators went to the SUBJECT PREMISES and set up surveillance.
11 Investigators saw a gray 1994 Toyota Camry with front-end damage and no license
12 plates, but what appears to be a fictitious white paper temporary tag bearing the characters
13 BNX4782 in the rear window on the driver's side. According to law enforcement
14 databases, M. LYNCH was issued a traffic ticket while driving that vehicle on or about
15 December 15, 2023.

16 14. Based on the foregoing I believe that M. LYNCH is in some type of
17 relationship with the person who lives at the SUBJECT PREMISES and is currently
18 located at the SUBJECT PREMISES. I therefore also believe there is probable cause to
19 issue a search warrant for the SUBJECT PREMISES to effectuate the arrest of M.
20 LYNCH on his federal arrest warrant and to execute the previously issued search warrant
21 for M. LYNCH.

22 15. I know, based on my training and experience, that drug traffickers
23 commonly use cellular telephones in furtherance of their criminal activities. I also know,
24 based on my training, experience, and common sense, that individuals often have their
25 cellular telephones with them where they are staying, in particular overnight.

26 16. The previously issued search warrant for M. LYNCH's person authorized
27 investigators to seize any cellular telephones on his person and at his known regular
residence. It further authorized investigators to use biometric characteristics to unlock
any cellular telephone that investigators reasonably believe to belong to M. LYNCH. I

1 therefore ask that the warrant authorize investigators to search the SUBJECT PREMISES
2 for any cellular telephones to determine if any belong to M. LYNCH, and to use the
3 biometric unlock features of said cellular telephones, as described in attachment B.

4
5 SIEDAH LESESNE

Digitally signed by SIEDAH LESESNE
Date: 2024.01.24 08:18:18 -08'00'

Siedah Lesesne
Special Agent
Drug Enforcement Administration

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8 The above-named agent provided a sworn statement to the truth of the foregoing
9 affidavit by telephone on the 14th day of December, 2023.
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11 

12 The Honorable S. Kate Vaughan
13 United States Magistrate Judge
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Attachment B

Persons, vehicles, and premises to be searched:

The person of Maurice LYNCH, born in 1975.

For persons to be searched, this includes the named person's clothing and that person's carried items and containers, such as cases, backpacks, and purses.

During the execution of the search of the Subject Persons, Vehicles, or Premises described in Attachment A, if law enforcement encounters a smartphone/cellular telephone equipped with a biometric-unlock feature, and if law enforcement reasonably suspects Maurice LYNCH is a user of the device, then investigators are authorized to seize and search said device for the following:

- i. Assigned number and identifying telephone serial number (ESN, MIN, IMSI, or IMEI);
- ii. Stored list of recent received, sent, or missed calls;
- iii. Stored contact information;
- iv. Photographs that constitute evidence of drug trafficking (21 U.S.C. 841, 846) or money laundering (18 U.S.C. 1956) crimes, and photographs that may show the user of the phone and/or co-conspirators, including any embedded GPS data associated with these photographs; and
- v. Stored text messages that constitute evidence of drug trafficking (21 U.S.C. 841, 846) or money laundering (18 U.S.C. 1956) crimes including Apple iMessages, Blackberry Messenger messages, WhatsApp, Telegram, Signal, other similar messaging services where the data is stored on the telephone.

For the purpose of attempting to unlock the device in order to search the contents as authorized by this warrant – law enforcement personnel are authorized to: (1) press or swipe the fingers (including thumbs) of the individuals to the fingerprint scanner of the device; and/or (2) hold the device in front of the face and open eyes of those same individuals and activate the facial, iris, or retina recognition feature.

In pressing or swiping an individual's thumb or finger onto a device and in holding a device in front of an individual's face and open eyes, law enforcement may not use excessive force, as defined in *Graham v. Connor*, 490 U.S. 386 (1989); specifically,

1 law enforcement may use no more than objectively reasonable force in light of the facts
2 and circumstances confronting them.

Attachment B

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1 law enforcement may use no more than objectively reasonable force in light of the facts
2 and circumstances confronting them.

ATTACHMENT A

PLACE TO BE SEARCHED

The Subject Premises is 32115 20th Lane SW, Apt. 55, Federal Way, Washington. This is a multi-unit apartment building. The complex's name is Sunset Three Twenty. Apartment 55 is located in Building 6, which is a two-level building that is blue in color with white trim. Apartment 55 is on the first floor.

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